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*Counsel for Defendants Listed on Exhibit "A"
Attached Hereto*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff- Applicant,

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,**

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC**

Plaintiff,

v.

**DEFENDANTS LISTED ON EXHIBIT "A"
ATTACHED HERETO,**

Defendants.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. Nos. listed on Exhibit "A"

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion to Dismiss, all prior papers and proceedings herein, and on such other and further arguments as may be presented prior to and at the hearing on the motions, the Defendants

listed on Exhibit "A" attached hereto, by and through undersigned counsel, will move to dismiss the complaints and/or amended complaints filed in adversary proceedings listed on Exhibit "A", pursuant to Rule 12(b) of the Federal Rules of Civil Procedure made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure, before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 at hearing to be held on the motions at a date to be determined by the Bankruptcy Judge in accordance with the procedures applicable to adversary proceedings.

PLEASE TAKE FURTHER NOTICE that the motions will be subject to further submissions on a schedule to be determined by the Court.

Dated: New York, NY
April 17, 2014

Respectfully submitted,

AKERMAN, LLP

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*Counsel for Defendants Listed on Exhibit "A"
Attached Hereto*

Adv. Pro. No.	Defendants represented by Akerman, LLP
10-04793	MARILYN LOBELL TRUST, a Florida Trust STEWART GLASSMAN, as Trustee MARILYN DAVIMOS a/k/a Marilyn Lobell
10-04386	THE GETTINGER FOUNDATION
10-05119	MISCORK CORP. #1 MARTIN GETTINGER, in his capacity as Trustee for Miscork Corp. #1 MISCORK CORP.
10-05219	CHARLES ELLERIN IRREVOCABLE GIFT GIVING TRUST, ROBERT M. GRIFFITH, in his capacity as Trustee of the Charles Ellerin Irrevocable Gift Giving Trust; JANET WINTERS, Individually as Beneficiary of the Charles Ellerin Irrevocable Gift Giving Trust,
10-04398	ELLERIN PARTNERSHIP, LTD., CHARLES ELLERIN REVOCABLE TRUST, in its capacities as General Partner and Limited Partner of the Ellerin Partnership, Ltd., ESTATE OF CHARLES ELLERIN, SHIRLEY ELLERIN, in her capacities as Personal Representative of the Estate of Charles Ellerin and Trustee of the Charles Ellerin Revocable Trust; CHARLES ELLERIN IRREVOCABLE GIFT GIVING TRUST, in its capacity as Limited Partner of the Ellerin Partnership, Ltd., ROBERT M. GRIFFITH, in his capacity as Trustee of the Charles Ellerin Irrevocable Gift Giving Trust; JANET WINTERS, Individually as Beneficiary of the Charles Ellerin Irrevocable Gift Giving Trust,
10-05166	ALLYN LEVY REVOCABLE TRUST, DATED SEPTEMBER 25, 1992, ALLYN LEVY, individually, as trustee of the Allyn Levy Revocable Trust, and as joint tenant, and JUDITH LEVY, individually and as joint tenant
10-04929	CELIA PALEOLOGOS REVOCABLE TRUST dated 5/26/98, a Florida Trust CELIA PALEOLOGOS, individually and as settlor and Trustee of the Celia Paleologos Revocable Trust dated 5/26/98
10-04392	CONSTANTINE PALEOLOGOS, individually CELIA PALEOLOGOS, individually
10-05073	RADOSH PARTNERS, a Florida Partnership BURNETT H. RADOSH, KATHERINE M. RADOSH, ALARIC P. RADOSH, JEREMY L. RADOSH, LEE J. RADOSH, as an individual and as guardian for R.R. and D.R. minors, LAURA RADOSH BUTT, as an individual and as guardian for L.B., a minor, and EDWARD A. RADOSH
10-04981	MAR PARTNERS ESTATE OF ALVIN RUSH, MARILYN RUSH in her capacity as administrator of the Estate of Alvin Rush, STEPHEN RUSH, in his capacity as administrator of the Estate of Alvin Rush, LAWRENCE RUSH, in his capacity as administrator of the Estate of Alvin Rush, RICHARD RUSH, in his capacity as administrator of the Estate of Alvin Rush, and GREGORY RUSH, in his capacity as administrator of the Estate of Alvin Rush
10-04456	THE ESTATE OF MIKE STEIN; RONALD S. KOCHMAN, in his capacity as personal representative of the Estate of Michael Stein, and JOEL H. LEVINE, in his capacity as personal representative of the Estate of Michael Stein